



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD

LOG D-0365

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2002 DEC 23 A 9:52

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REPLY TO THE ATTENTION OF:

DEC 19 2002

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Thorium Contaminated Debris
Implementation Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) implementation plan to stockpile thorium contaminated debris from facilities Decontamination and Decommissioning (D&D) projects. The document presents a plan to stockpile thorium contaminated debris from Plants 2, 3, 8, and the pilot plant.

U.S. EPA has attached its comments on the document, which need to be addressed. Therefore, U.S. EPA disapproves the implementation plan to stockpile thorium contaminated debris from facilities D&D pending receipt of adequate responses to the attached comments. U.S. DOE must submit responses to comments and a revised implementation plan within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Sally Robison, U.S. DOE-HDQ
Jamie Jameson, FERMCO
Terry Hagen, FERMCO
Tim Poff, FERMCO

TECHNICAL REVIEW COMMENTS ON
"IMPLEMENTATION PLAN TO STOCKPILE THORIUM CONTAMINATED DEBRIS FROM
FACILITIES D&D PROJECTS"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: NA Line #: NA
General Comment #: 1

Comment: Section 1.0 of the implementation plan states that the approach described in the plan will "facilitate safe storage of thorium contaminated debris with appropriate radiological controls." The plan does not discuss monitoring or control of radiological parameters. The plan should either be revised to discuss how thorium levels will be monitored and controlled in the vicinity of the stockpiles or, at a minimum, should reference other Fernald Environmental Management Project (FEMP) documents that contain this information.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.3 Page #: NA Line #: NA
Specific Comment #: 1

Comment: The text states that airborne emissions of thorium shall be mitigated through applications of "lock-down" to debris. The text should be revised to identify the types of "lock-down" that could be applied to the debris.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 5.0 Page #: NA Line #: NA
Specific Comment #: 2

Comment: Section 5.0 should be revised to identify a specific frequency for inspection of the stockpiles.